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October 13, 2022

By ECF and Email

Honorable Allyne R. Ross United States District Judge

United States District Court for the

Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re:

United States v. Ezhil Sezhian Kamaldoss et al., No. 19 Cr. 543 (ARR)

Dear Judge Ross:

On behalf of our client Ezhil Kamaldoss, we write to respectfully request a two-week extension of the deadline for submitting our objections to the Presentence Investigation Report ("PSR") in this matter.

On September 30, 2022, the Probation Department released its initial version of the PSR. Pursuant to Rule 32(f)(1) of the Federal Rules of Criminal Procedure, the parties have 14 days after receiving the PSR to set forth their objections. Accordingly, our objections are currently due on October 14, 2022.

We seek an extension of this date because we have not yet been able to discuss and review the PSR with our client. In fact, we have been conferring with Mr. Kamaldoss frequently of late in order to gather information for and submit a final version of the personal financial statement that the Probation Department requested of him, and we expect to be able to submit that financial statement early next week. We will then be meeting with Mr. Kamaldoss to review the PSR, including during a meeting that we have scheduled for October 17, 2022. Against this backdrop, we expect that we will require until approximately October 28, 2022 to provide the Probation Department with any objections and clarifications to the PSR, and we respectfully request an extension until that date.

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We thank the Court for its consideration of the extension sought herein.

Respectfully submitted,

/s/
Robert M. Radick
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cc: AUSA Nicholas Moscow (by email and ECF)
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